

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: March 27, 2009

Name of company(s) covered by this certification: Comtronics Corporation

Form 499 Filer ID: FRN # 0004896916

Name of signatory: Catherine Leonard

Title of signatory: President

I, Catherine Leonard, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. See attached statement.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed Catherine Leonard Pres.



Comtronics Corp.
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STATEMENT OF COMPLIANCE

Comtronics Corp. has established operating procedures that ensure compliance with the Federal Communication Commission regulations regarding the protection of customer proprietary network information ("CPNI").

Comtronics has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.

Comtronics Corporation continually educates and trains its employees regarding the appropriate use of the CPNI. Comtronics has established disciplinary procedures should an employee violate the CPNI procedures established by Comtronics.

Comtronics maintains a record of its sales and marketing campaigns that use its customers' CPNI. Comtronics also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign and what products and services were offered as a part of the campaign.

Comtronics has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records or carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI and a process ensures that opt-out elections are recorded and followed.

Comtronics took the following actions against data brokers in 2008, including proceedings instituted or petitions filed by Comtronics at a state commission, in the court system, or at the Federal Communications Commission: **NONE**

The following is information Comtronics has with respect to the processes pretexters are using to attempt to access CPNI, and what steps Comtronics is taking to protect CPNI: **Comtronics has determined that no pretexter has attempted to access CPNI or Comtronic's system**

The following is a summary of all customer complaints received in 2008 regarding the unauthorized release of CPNI:

Numbers customer complaints Comtronics received in 2008 related to unauthorized access to CPNI or unauthorized disclosure of CPNI: **NONE**

Comtronics Corp. does not offer interconnected services. Comtronics does not publish, disclose or sell to third parties our customers proprietary information.